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March 6, 2009

## **VIA ELECTRONIC-DELIVERY**

Charles L.A. Terreni
Chief Clerk & Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

Re:

Progress Energy Carolinas, Incorporated Request to Revise Area Lighting Service Schedule ALS and Street Lighting Service Schedule SLS

Docket No. 2009-92-E

Dear Mr. Terreni,

The purpose of this letter is to inform the Public Service Commission ("Commission") that the Office of Regulatory Staff ("ORS") has reviewed the above referenced filing and has no objection to Progress Energy Carolinas' ("Company") request to revise its outdoor lighting schedules. The revision will restrict the availability of the 40,000 lumen metal halide fixture to existing installations and will introduce a new 33,000 "pulse-start" lumen metal halide fixture as an alternative lighting option. These revisions are in response to the Energy Independence and Security Act of 2007 which requires that ballasts installed in certain metal halide fixtures meet higher efficiency standards. The Company believes the use of "pulse start" metal halide technology is the most practical way to meet this new national lighting efficiency standard.

Thank you for the opportunity to provide our comments in this matter.

Sincerely,

John W. Elitter

JWF/swh

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ELECTRONIC FILING INSTRUCTIONS

cc: Dan F. Arnett, Chief of Staff, SC ORS

with low,

Nanette S. Edwards, Chief Counsel and Director of Legal Services, SC ORS

Shealy Boland Reibold, Esquire, SC ORS

Len S. Anthony, General Counsel – Regulatory Affairs, Progress Energy Carolinas

Dr. James Spearman, Executive Assistant, SC PSC